

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:14-CR-151-Y

JESUS GERARDO LEDEZMA-CEPEDA (01)
JESUS GERARDO LEDEZMA-CAMPANO (02)
JOSE LUIS CEPEDA-CORTES (03)

GOVERNMENT'S AMENDED NOTICE OF EXPERT DESIGNATION

The United States of America files this amended designation of expert witnesses pursuant to the Court's order. The government intends to call:

1. Maria Cruz Ochoa, Customs and Border Protection Officer

This witness will testify regarding border crossings of the defendants.

2. Officer B.W. Randolph, Fort Worth Police Department

This witness will testify regarding the forensic examination of cellular phones seized as part of the investigation.

3. Special Agent Refugio Hernandez, Homeland Security Investigations

This witness will testify regarding law enforcement actions taken in the investigation of the murder of J.J.G.C.

4. Cooperating Witness

This witness will testify regarding the language used among drug traffickers.

5. Lizette Arrocho Stephens, FBI Translator

This witness will testify regarding the translation of Spanish language documents into English.

6. Clark Swanson, Blackline GPS

This witness will testify regarding the technology in the trackers used in this conspiracy and the data recovered from the devices.

7. SA Michael Elsey, FBI

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

8. SA Gary Koenig, FBI

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

9. SA Yoshi Bodie, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

10. Jeff Lloyd, DEA Analyst

This witness will testify regarding the use of technology in the conspiracy, including, but not limited to, information recovered from cellular records, ISPs, and electronic equipment seized from the defendants. He will further testify regarding communication techniques used by members of the conspiracy and used by members of narcotics organizations. Mr. Lloyd may further testify regarding the segregation of responsibilities that occurs within narcotics organizations.

11. Tom Hager, Analyst, USAO

This witness will testify regarding the financial records of the defendants.

12. Dr. Tasha Greenberg, Tarrant County Medical Examiner's Office

This witness will testify regarding the autopsy she performed on J.J.G.C.

13. Officer Karl Moore, Southlake Police Department

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

14. Kazia Crocker, Blackberry Corporation

This witness will testify regarding the technology of Blackberry messaging and records related to the use of Blackberry phones.

15. SA Monica Segedy, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

16. Aubree Crews, FBI

This witness will testify regarding fingerprint evidence recovered in the investigation.

17. Shane Hoffman, DNA Analyst, FBI

This witness will testify regarding DNA evidence recovered in the investigation.

18. SA Mark Sedwick, FBI Cellular Analysis Survey Team

This witness will testify regarding the locations of trackers and cellular phones during the conspiracy.

19. Thomas Song, Deputy Director, Computer Crime and Intellectual Property Section

This witness will testify regarding the forensic examination of computer equipment and cellular phones seized in the investigation.

20. M. Kline, Crime Scene Investigator, Tarrant County Sheriff's Department

This witness will testify regarding the crime scene investigation done in Southlake Town Square.

21. SA Paul Ramirez, DEA

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy. This witness will testify regarding Mexican drug trafficking organizations.

22. SA Tony Santos, DEA, Retired

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

23. Cathy Cisco, Southlake Police Department Evidence Custodian

This witness will testify regarding the collection of evidence in this investigation.

24. SA Rodrigo Gonzalez, III, FBI

This witness will testify regarding the manner and means used to recover fingerprints from the victim's vehicle.

25. SA Kenny Radfar, FBI

This witness will testify regarding the manner and means used to recover fingerprints from the victim's vehicle.

26. Jesse Basham, FBI

This witness will testify regarding the handling of electronic evidence in the investigation.

27. SA Lynette Linn, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

28. SA Paul Huber, DEA

This witness will testify regarding DEA license plate reader technology.

29. SA Todd Emery, DEA

This witness will testify regarding DEA license plate reader technology.

30. Donald J. Whitehead

This witness will testify regarding the Tarrant Appraisal District records.

31. SA Lee Lucas, DEA

This witness will testify regarding Blackberry devices.

32. SA Gannon Hicks, DEA

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

33. Donald Wills, FBI

This witness will testify regarding the handling of electronic evidence in the investigation.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

s/ Joshua T. Burgess
JOSHUA T. BURGESS
Assistant United States Attorney
State Bar No. 24001809
Burnett Plaza, Suite 1700
801 Cherry Street, Unit #4
Fort Worth, Texas 76102
Telephone: 817-252-5200
Facsimile: 817-252-5455

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2016, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Joshua T. Burgess
JOSHUA T. BURGESS
Assistant United States Attorney